

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MARK WATSON,

Plaintiff,

v.

DAVID R. GRIMMETT,

Defendant.

Case No. 3:22-cv-00601

Chief Judge Waverly D. Crenshaw, Jr.  
Magistrate Judge Alistair E. Newbern

**JOINT MOTION FOR EXTENSION OF DEADLINE TO FILE DISMISSAL PAPERS**

Plaintiff Mark Watson (“Plaintiff”), and Defendant David R. Grimmett (“Defendant”), by and through their undersigned counsel, for their Joint Motion for Extension of Deadline to File Dismissal Papers, state as follows:

1. On October 13, 2023, the Parties filed a Notice of Settlement and Motion to Stay (ECF No. 30), informing the Court that they had reached a settlement in principle and requesting that the Court stay all remaining deadlines to allow the Parties time to finalize the settlement terms and dismiss the case.

2. The Parties informed the Court that they anticipated filing their dismissal papers by November 13, 2023. *Id.*

3. On October 16, 2023, the Court granted the Parties’ Motion to Stay and ordered the Parties to file their dismissal papers by November 13, 2023. ECF No. 31.

4. The Parties are still in the process of finalizing settlement terms and in the process of drafting their settlement agreement document to the satisfaction of all parties.

5. The Parties respectfully request that the deadline to file their dismissal papers be extended until January 12, 2024. The Parties believe that this much additional time is necessary to

account for the upcoming holiday season and to allow the Parties and their counsel enough time to finalize a settlement agreement document that is to the satisfaction of all parties.

6. This motion is not brought for the purpose of delay, and the requested extension will not prejudice any party.

WHEREFORE, the Parties jointly request that the deadline to file their dismissal papers be extended until January 12, 2024; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

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Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of November, 2023, a copy of the foregoing **Joint Motion for Extension of Deadline to File Dismissal Papers** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

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*/s Colby Qualls*  
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